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April 14, 2017

Via ECF

Honorable Valerie E. Caproni, U.S.D.J.
United States District Court for the
Southern District of New York
United States Courthouse
40 Foley Square, Room 240
New York, NY 10007

Re: Anand Gupta v. Al Jazeera America, LLC, et al.
Civil Action No. 1:16-cv-02980 (VEC)

Dear Judge Caproni:

This firm represents Defendants Al Jazeera America, LLC (“AJAM”) and Al Anstey (“Anstey”) (collectively, “Defendants”) in the above-captioned matter. We request an extension of fourteen (14) days of the deadline for Defendants to submit their motion for summary judgment, along with a commensurate extension of fourteen (14) days for submission of Plaintiff’s opposition and Defendants’ reply. Presently, Defendants’ motion for summary judgment is due on April 28, 2017, with opposition due by May 31, 2017, and reply due by June 14, 2017. We have conferred with counsel for Plaintiff, who do not oppose this request.

Fact discovery closed on March 31, 2017. Since that date, the parties have diligently worked to resolve outstanding discovery issues. On April 7, 2017, the parties appeared by telephone before Your Honor, resulting in the parties’ agreement to enter into a stipulation narrowing remaining issues and curtailing further dispute. The parties continue to confer on the few remaining discovery issues and hope to avoid raising them with the Court. The modest extension of time sought herein will allow counsel to work toward resolution of the remaining issues in advance of summary judgment.

Thank you for your time and attention to this matter.

Respectfully submitted,

s/Joseph D. Guarino

Joseph D. Guarino

Admitted Pro Hac Vice

cc: Jeremiah Iadevaia, Esq. (via e-mail and ECF)
Joshua Tarrant-Windt, Esq. (via e-mail and ECF)